

States Working Group

Ideas for Pilots

- 1) **Use Existing State Documents / Certifications** – Satisfy the CHAS requirements using State plans or other State documents, in other words, no separate Consolidated Plan especially prepared for HUD in a prescribed format. Instead, States would "crosswalk" to other existing State documents as much as possible and send those already prepared documents to HUD. This would help to see whether States can comply with the statute without having to prepare reams of paper to submit to HUD and whether this approach is less onerous than the current regulatory requirements. Also, States ConPlan submission would focus only on those priority needs expressed by the State, with States reporting to HUD based on these State priorities. States could then use ConPlan as "communication tool" to discuss priority needs throughout State.
- 2) **Eliminate Non-Housing CD Strategy** – Provide the housing strategy only and see if this cuts down on the administrative burden, and whether it is useful to the agency and citizens as a plan.
- 3) **States Format for ConPlan Submission** – Allow States to design their own format for the ConPlan while complying with HUD regulatory requirements. This differs from number #1 in that all of the regulatory requirements would still have to be met, but instead of a prescribed format, permit States to submit what they believe is the most appropriate information in the most user-friendly way. Also, create "Master ConPlan" for those elements that do not change, and the "Annual Action Plan" will address areas of change and include only 1) methods of distribution; 2) program data, as applicable; and 3) SF-424. Then if no activity in a given year, it is possible the "Annual Action Plan" is comprised of a SF-424 only.
- 4) **Electronic Submission** – All required elements of ConPlan submission be electronic only—no paper requirement.
- 5) **Effective Citizen Participation** – In lieu of in-person public hearings, permit States to conduct online "cyber-hearings". Purpose is to make CP process more meaningful for States, its citizens and HUD. A variation on this would be to prepare a separate submittal called the "ConPlan", but only distribute it electronically to HUD.
- 6) **States Format for ConPlan Reporting** – States will develop a template for reporting accomplishments specific to States as a grantor agency. Purpose is to reduce burdensome reporting requirement of IDIS (grants management) and CAPER / PER reporting (4 formula grants programs) and to make the process more meaningful to States, its citizens, and HUD. Must be a like reduction in other reports currently required by HUD.